

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

STEVEN NOVIA

v.

**MOBIZ INC., ET AL.
Defendants**

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Civil Action No. 25-CV-11036-AK

**ASSENTED MOTION FOR EXTENSION
OF TIME TO RESPOND TO THE COMPLAINT**

Defendant MoBiz Inc. (“MoBiz”) respectfully requests that the Court extend its deadline to respond to the Plaintiff’s Complaint until July 3, 2025. Mobiz recently retained the undersigned counsel, which seeks additional time to investigate Plaintiff’s claims and allegations. By filing this motion, MoBiz does not intend to waive, and hereby expressly reserves, any and all defenses, including but not limited to any arguments or defenses related to service, venue, and/or personal jurisdiction.

Plaintiff has assented to this request.

Respectfully submitted

MOBIZ INC.

By its attorneys:

/s/ John J. Butts

John J. Butts (BBO No. 643201)

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CERTIFICATE OF CONFERENCE

I certify that, on May 19, 2025, pursuant to Local Rule 7.1(a)(2), I conferred with counsel for Plaintiff, Anthony Paronich, regarding this motion and that counsel agreed to this extension of time.

/s/ John J. Butts
John J. Butts

CERTIFICATE OF SERVICE

I certify that, on May 28, 2025, this document was electronically filed with the Clerk of Court using the Court's CM/ECF system, which will then serve a notification of the filing to the registered parties of record.

/s/ John J. Butts
John J. Butts